

## **REMARKS**

### **Information Disclosure Statement**

The Examiner notes that the Information Disclosure Statement (IDS) filed on February 13, 2007 does not list Japanese Unexamined Patent Application, First Publication No. H5-34646, and the reference is not found in the IDS filed September 26, 2003 as stated. Applicants respectfully submit that there is a typographical error in the February 13, 2007, IDS. Publication No. H5-34646 should have been Publication No. H5-346461.

Japanese Unexamined Patent Application, First Publication No. H5-346461, which is the correct application number, was submitted in the IDS filed on September 26, 2003.

### **Claim Rejections**

#### **Claims 1, 3, 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20**

Independent claims 1 and 3, and dependent claims 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss in view of Fuchs.

In the Response to Arguments section of the Office Action, the Examiner alleges that Applicants' recitation that the discrete connection terminal is "configured to receive" a flat cable is not a positive limitation but merely requires an ability to receiving flat cable. The Examiner alleges that Fuchs is capable of receiving a flat cable.

Applicants have amended claims 1, 3 and 4 to recite that the discrete connection terminal receives a flat cable. Applicants now traverse this rejection.

The combination of Guss and Fuchs does not disclose or suggest at least a connecting structure for auxiliary machinery comprising a discrete connection terminal which receives said

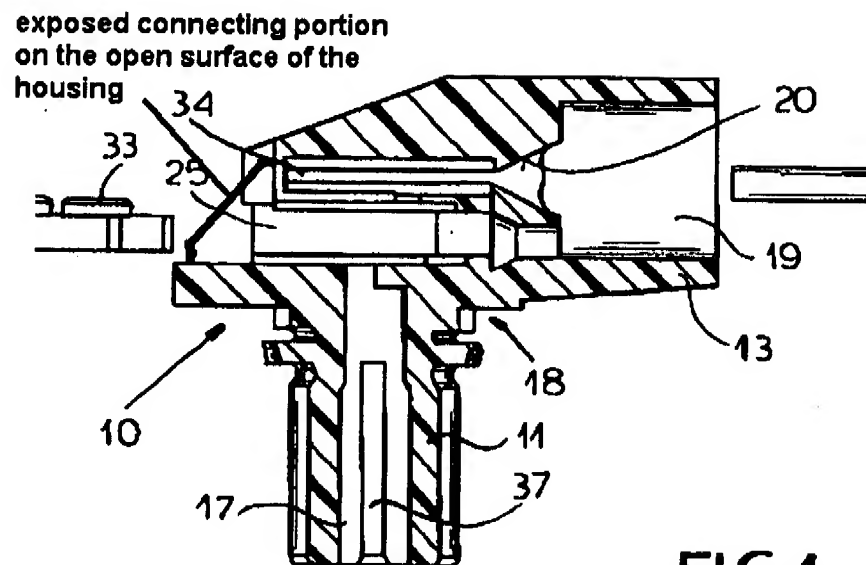
flat cable, as set forth in independent claim 1. The Examiner concedes that Guss fails to disclose or suggest at least this configuration. Fuchs does not cure the deficiencies of Guss.

Figures 1-3, 5 and 6 of Fuchs show that the multi-conductor cable 15 is not a flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration as in Applicants' claim 1. Fuchs clearly discloses a round cable. As shown in Fig. 4 of Fuchs, after the wires 14 have been stripped out of the multi-conductor cable 15, the individual wires 14 of the multi-conductor cable 15 are arranged for attachment to the contacts 16. Thus, even assuming *arguendo* that ***Fuchs is configured to receive conductors in a flat configuration*** as alleged by the Examiner, Fuchs does not disclose or suggest a discrete connection terminal ***which receives said flat cable*** in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, as set forth in independent claim 1.

Since neither Guss nor Fuchs, either alone or in combination, discloses or suggests at least the above-noted features, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine the references as attempted by the Examiner. Therefore, claim 1 is patentable over the combination of Guss and Fuchs.

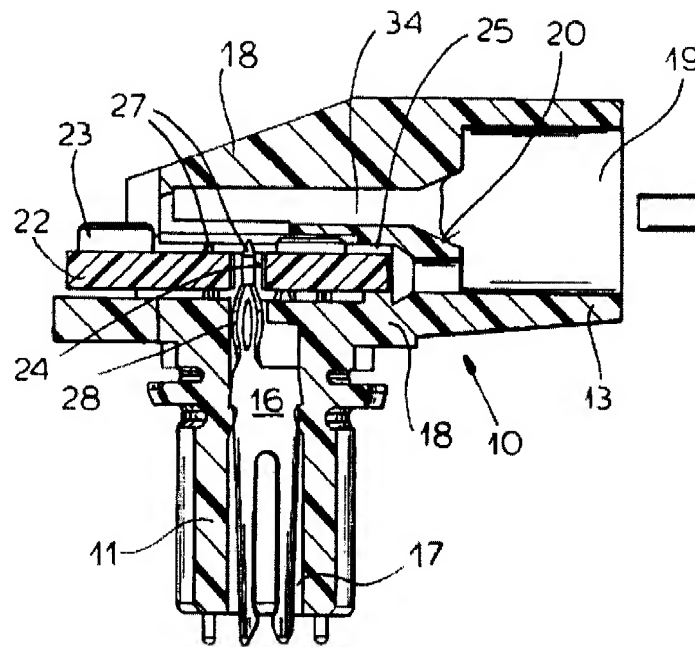
Further, the Examiner alleges that Fuchs discloses an exposed connecting portion which exposes a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing, as recited in claim 1. Applicants respectfully disagree.

As illustrated below in the Examiner's annotated Fig. 1 reproduced from the Office Action, the Examiner identifies an alleged exposed connecting portion.



**FIG.1**

However, as can be seen from Fig. 2 of Fuchs reproduced below, the connecting portion does not expose a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing. In fact, the portion of the connector identified by the Examiner merely allows printed circuit board 22 to be inserted into the connector body 18. The tip 27 of contact 16 is then inserted to make electrical contact with hole 24 and circuit board 22. Thus, the connection is not exposed and is not on an outer surface of the housing. Therefore, the combined references also fails to disclose or suggest an exposed connecting portion which exposes a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing, as recited in claim 1.



**FIG. 2**

With further regard to claim 1, the Examiner fails to address wherein a first portion of said flat cable which extends from the connection is provided on and extends along an outer surface of said auxiliary machinery, as recited in the claim. Since the combination of Guss and Fuchs does not disclose these features, claim 1 should be patentable for this additional reason.

**Claim 2**

Dependent claim 2 has been rejected under § 103(a) as allegedly being unpatentable over Guss in view of Fuchs, and further in view of Boyle.

By virtue of its dependence from claim 1, claim 2 incorporates a discrete connection terminal which receives said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, and an exposed connecting portion which exposes a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing. The combination of Guss, Fuchs and Boyle does not disclose or suggest at least these features.

As established above, the combination of Guss and Fuchs fails to disclose at least the above-noted claimed features. Boyle does not cure the deficiencies of Guss and Fuchs. As illustrated in Fig. 1 of Boyle, the reference discloses a round multi-conductor cable which terminates in a connector assembly 14 after passing through a strain relief hood 18. Boyle clearly discloses a round multi-conductor cable, as opposed to Applicants' claimed flat cable. Further, Boyle clearly does not disclose or suggest an exposed connecting portion as recited in claim. Therefore, since Boyle does not disclose or suggest all of Applicants' claimed features, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine the references as attempted by the Examiner. Thus, claim 2 is patentable over the combined references.

**Claim 4**

Independent claim 4 has been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss in view of Fuchs, and further in view of Arnett.

The combination of Guss, Fuchs and Arnett does not disclose or suggest at least a discrete connection terminal which receives said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, and an exposed connecting portion which exposes a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing, as recited in the claim.

As established above in the arguments for claim 1, the combination of Guss and Fuchs fails to disclose or suggest at least these features. Arnett does not cure the deficiencies of the Guss-Fuchs combination. The Examiner relies on Arnett to allegedly disclose various mounting structures for the auxiliary machinery. Therefore, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine the references as attempted by the Examiner, since the combination would still not result in the features claimed by Applicants. Thus, claim 4 is patentable over the combination of Guss, Fuchs and Arnett.

**Claims 5, 6, 9, 12, 15, 18 and 21**

Dependent claims 5, 6, 9, 12, 15, 18 and 21 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Guss in view of Fuchs and Arnett, and further in view of Archer.

These dependent claims incorporate the features of claim 4 which, as established above, are not disclosed or suggested by the combination of Guss, Fuchs and Arnett. Archer does not

cure these deficiencies. The Examiner relies on Archer to allegedly disclose an abutting portion in the form of a collar. However, Archer fails to disclose or suggest at least the features of a discrete connection terminal which receives said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, and an exposed connecting portion which exposes a connection between said discrete connection terminal and at least one conductor of said flat cable on an outer surface of said housing which are deficient in the Guss-Fuchs-Arnett combination.

In view of the above, since the combined references would not result in the features as claimed, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine the references as attempted by the Examiner. Therefore, dependent claims 5, 6, 9, 12, 15, 18 and 21 should be patentable over the combination of Guss, Fuchs, Arnett and Archer.

### **Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.114(c)  
U.S. Application No.: 10/670,524

Attorney Docket No.: Q77632

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

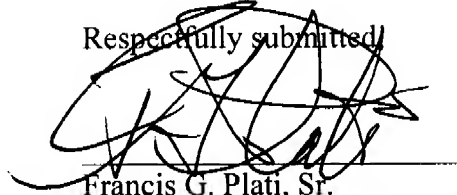
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**23373**

CUSTOMER NUMBER

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Francis G. Plati, Sr.', is written over a horizontal line.

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Registration No. 59,153

Date: September 4, 2007